## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

LOI TAN NGUYEN,	)
Loi Imi ilocitali,	)
Plaintiff	)
v.	Civil Action No. 04-CV-11781-DPW
NMT MEDICAL, INC.,	)
Defendant.	) )

## AFFIDAVIT OF JULIE MURPHY CLINTON IN SUPPORT OF THE STATEMENT OF UNDISPUTED MATERIAL FACTS OF DEFENDANT NMT MEDICAL, INC.

I, Julie Murphy Clinton, Esq., hereby depose and say under the penalties of perjury:

- I am an attorney admitted to the bar of the Commonwealth of Massachusetts. I 1. am an Associate at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts 02109.
- 2. Wilmer Cutler Pickering Hale and Dorr LLP has represented defendant NMT Medical, Inc., in the above-captioned action pending in this Court since the inception of the action.
- 3. Attached hereto are true and accurate copies of pleadings, discovery documents, deposition transcript excerpts, documents produced during discovery, affidavits and other relevant documents as set forth below:

EXHIBIT	DOCUMENT
1.	Affidavit of Cara Hard
2.	Excerpts from Deposition of Loi Tan Nguyen

3.	Affidavit of Sean Forde
4.	Affidavit of Kellywan Kan
5.	Affidavit of Lee Core
6.	Affidavit of Blong Xiong
7.	Memorandum Agreement between Mr. Nguyen and Mr. Kan
8.	Affidavit of Andrzej Chanduszko
9.	E-mail from Sean Forde Dated June 23, 2003
10.	EEOC Dismissal and Notice of Rights
11.	MCAD Notice

NMT MEDICAL, INC.,

By its attorneys,

/s/ Julie Murphy Clinton
Laura E. Schneider (BBO # 562030) Julie Murphy Clinton (BBO# 655230) Wilmer Cutler Pickering Hale and Dorr LLP 60 State Street Boston, MA 02109 (617) 526-6000

Dated: August 29, 2006

## **CERTIFICATE OF SERVICE**

I, Julie Murphy Clinton, hereby certify that on August 29, 2006, I caused a copy of the foregoing document to be served, by electronic and first class mail, upon plaintiff Loi Tan Nguyen.

/s/ Julie Murphy Clinton

Julie Murphy Clinton

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